

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref No. \_\_\_\_\_

**ORDER SUSTAINING THE FTX RECOVERY TRUST'S AMENDED  
OBJECTION TO NON-CUSTOMER PROOF OF CLAIM NO. 100112  
FILED BY LAWRENCE D. VAN DYN HOVEN**

Upon the amended objection (the “Amended Objection”) of the FTX Recovery Trust,<sup>2</sup> for entry of an order (this “Order”) sustaining the Amended Objection and disallowing and expunging in its entirety non-customer proof of claim number 100112 filed by Lawrence D. Van Dyn Hoven (the “Claim”); and this Court having jurisdiction to consider the Amended Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Amended Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and upon consideration of the Amended Objection; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Amended Objection and the relief requested therein has

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

been provided in accordance with the Bankruptcy Rules and the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and that, except as otherwise ordered herein, no other or further notice is necessary; and any replies (if any) to the Amended Objection having been withdrawn, resolved or overruled on the merits; and upon the record of any hearing held to consider the relief requested in the Amended Objection; and this Court having found and determined that the legal and factual bases set forth in the Amended Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Amended Objection is SUSTAINED as set forth herein.
2. The Claim is disallowed and expunged in its entirety.
3. The clerk of the Court and the claims and noticing agent appointed in the Chapter 11 Cases are directed to reflect the disallowance of the Claim in their respective records.
4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (i) an admission as to the amount of, basis for, or validity of any claim against the FTX Recovery Trust; (ii) a waiver of the FTX Recovery Trust’s rights to dispute any claim on any grounds; (iii) a promise or requirement to pay any claim; (iv) an implication or admission that any particular claim is of a type specified or defined in this Amended Objection or any order granting the relief requested by this Amended Objection; (v) an approval or assumption of any agreement, contract, or lease under section 365 of the Bankruptcy Code; or (vi) a waiver of the FTX Recovery Trust’s rights under the Bankruptcy Code or any other applicable law.

5. Should one or more of the grounds of objection stated in the Amended Objection be dismissed, the FTX Recovery Trust's right to object on any other grounds that the FTX Recovery Trust discovers is preserved.

6. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

7. The FTX Recovery Trust is authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

8. The Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: \_\_\_\_\_, 2025  
Wilmington, Delaware

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The Honorable Karen B. Owens  
Chief United States Bankruptcy Judge